

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,
Plaintiffs,
v.
GOOGLE LLC,
Defendant.

Case No.: 20-cv-04688-RS

**SUPPLEMENTAL DECLARATION OF
CAMERON R. AZARI, ESQ. REGARDING
IMPLEMENTATION OF CLASS NOTICE
PLAN**

I, Cameron R. Azari, Esq., declare as follows:

1. My name is Cameron R. Azari. I understand that this declaration is being submitted to the Court pursuant to the Court's orders directing notice to members of the certified classes, which require the class notice administrator to report requests for exclusion and related information regarding implementation of the Court-approved notice plan. *See* Dkt. 440. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. In this declaration, I provide updated settlement administration statistics regarding requests for exclusion for the above-captioned matter. These statistics are amended to include an additional timely request for exclusion, which Epiq had not received until after the submission of my March 20, 2025, declaration.

3. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business.

4. I am a nationally recognized expert in the field of legal notice, and I have served as an

1 expert in hundreds of federal and state cases involving class action notice plans.

2 5. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”)
3 and the Managing Director of Legal Notice (aka Hilsoft Notifications), a business unit of Epiq that
4 specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal
5 notification plans. Epiq recently rebranded Hilsoft Notifications as Epiq Legal Noticing. Epiq and
6 Epiq Legal Noticing will hereinafter be referred to as “Epiq.”

7 **OVERVIEW**

8 6. This declaration provides updated settlement administration statistics regarding
9 requests for exclusion and an Amended Exclusion Report following the successful implementation
10 of the Revised Class Notice Plan (“Class Notice Plan”) and notices (the “Notice” or “Notices”) for
11 *Rodriguez et al. v. Google LLC.*, Case No. 20-cv-04688, in the United States District Court for the
12 Northern District of California.

13 7. I previously executed my *Declaration of Cameron R. Azari, Esq. Regarding Proposed*
14 *Class Notice Plan and Notices* (“Notice Plan Declaration”) on March 7, 2024, which described the
15 Class Notice Plan, detailed Hilsoft’s class action notice experience, and attached Hilsoft’s *curriculum*
16 *vitae*. I also provided my educational and professional experience relating to class actions and my
17 ability to render opinions on overall adequacy of notice programs. Subsequently, I executed my
18 *Supplemental Declaration of Cameron R. Azari, Esq. Regarding Proposed Class Notice Plan and*
19 *Notices* (“Supplemental Notice Plan Declaration”) on April 26, 2024, which advised the Court
20 whether any aspect of the Court’s *Order Granting In Part Motion To “Clarify” Class Definition*
21 required changes to the previously approved Class Notice Plan, and additionally, identified what
22 revisions were made to the Notices as a result of Court approved changes to the class definition. Most
23 recently, I executed my *Declaration of Cameron R. Azari, Esq. Regarding Implementation and*
24 *Adequacy of Class Notice Plan and Notices* (“Notice Implementation Declaration”) on March 20,
25 2025, which detailed the successful implementation of the Class Notice Plan, provided administration
26 statistics, and attached the initial Exclusion Report.

Requests for Exclusion

8. The deadline to request exclusion from the case was February 20, 2025. An Exclusion Report was included with my Notice Implementation Declaration, which identified 542 requests for exclusion¹ that Epiq had been received as of the date of that declaration.

9. Since the deadline to request exclusion was a postmarked deadline, Epiq has received one additional request for exclusion following my Notice Implementation Declaration being filed with the Court. This additional request for exclusion was mailed from overseas using Saudi Post and was postmarked February 12, 2025, however it was not received by Epiq until March 25, 2025.

10. As of March 26, 2025, Epiq has received 543 requests for exclusion (including those previously reported to the Court in my Notice Implementation Declaration. The Amended Exclusion Report is included as **Exhibit 1**.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 2, 2025.



Cameron R. Azari, Esq.

¹ Each email address that was included in a request for exclusion by a Class Member is considered a separate request for exclusion. Those Class Members who submitted a request for exclusion(s) for one or more email addresses may have additional email addresses for which they did *not* request exclusion.

Exhibit 1



Rodriguez et al. v. Google LLC
Amended Exclusion Report

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